



Dated: January 14, 2015

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Respectfully submitted,

MEXICAN AMERICAN LEGAL DEFENSE  
AND EDUCATIONAL FUND  
By /s/ Nina Perales  
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(Requests for *pro hac vice* admission to be  
filed)

Attorneys for the Proposed Defendant-Intervenors **JANE DOE #1, JANE DOE #2, and  
JANE DOE #3**

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that, on the 14<sup>th</sup> day of January 2015, I electronically filed the above and foregoing document using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

*/s/ Nina Perales*

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Nina Perales (Tex. Bar No. 24005046)

***Attorney for Proposed Defendant-  
Intervenors***

No. 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

State of Texas, *et al.*,

Plaintiffs,

v.

United States of America, *et al.*,

Defendants.

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Civil Action No. 1:14-cv-254

DECLARATION OF DEFENDANT INTERVENOR MOVANT JANE DOE #1

My name is JANE DOE #1. I am over the age of 18 and fully competent to make this declaration.

1. I live in Edinburg, TX. I have resided in the United States for 15 years.
2. I was born in 1971 in Reynosa, Tamaulipas, Mexico. I attended school in Mexico until the 8<sup>th</sup> grade. In Mexico I worked as a laborer and I cooked and sold food.
3. I am married and have four children. My oldest child, J [REDACTED], is married; he attends college and works. Still living at home, my daughter R [REDACTED], who is 21, attends college and works to help support our family. My daughter G [REDACTED] is 14 years old and is in the ninth grade. My son E [REDACTED] is 8 years old and in the second grade. All of my children get good grades in school.
4. Here in the U.S. I work making and selling tamales and other food. I also do catalog sales. My husband also works to support our family.

5. Outside of work and my responsibilities at home, I volunteer at my church and participate in school field trips for my children.
6. I came to the United States in July 1999 and have remained in the U.S. since that time.
7. I believe that I am eligible for deferred action because I am the parent of U.S. citizen children, I have resided continuously in the U.S. since before 2010, I do not have permission to be in the U.S. and I am not an enforcement priority.
8. I want to participate in this case in order to defend deferred action for myself and other parents in my situation.
9. Because I do not have permission to be in the U.S., I would like to proceed in this case pseudonymously. I am aware of the debate in Texas over immigration as reported in the media. I am fearful that if my name and immigration status were made public, I would face opprobrium and possibly harassment from members of the public who support this lawsuit. I understand that deferred action is discretionary on the part of the federal government and am also very concerned that revealing my name and immigration status to federal authorities will subject me to possible arrest, detention and removal from the U.S.
10. If the Court grants my request to proceed as Jane Doe in this lawsuit, my attorneys will file under seal or in camera a second declaration executed by me on this same date in which my true name is revealed.

I declare under penalty of perjury pursuant to 28 U.S. Code § 1746 that the foregoing is true and correct.

Executed this 12 day of January, 2015 in Edinburg, Texas.

JANE DOE #1  
JANE DOE #1

CERTIFICATE OF TRANSLATION

1. My name is David G. Hinojosa and I speak English and Spanish.
2. I sight translated the foregoing declaration from English to Spanish by reading it to JANE DOE #1 in Spanish.
3. JANE DOE #1 affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury pursuant to 28 U.S. Code § 1746 that the foregoing is true and correct.

Executed this 12 day of January, 2015 in McAllen, Texas.

David G. Hinojosa  
David G. Hinojosa

No. 2



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

State of Texas, *et al.*,

Plaintiffs,

v.

United States of America, *et al.*,

Defendants.

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Civil Action No. 1:14-cv-254

DECLARATION OF DEFENDANT INTERVENOR MOVANT JANE DOE #2

My name is JANE DOE #2. I am over the age of 18 and fully competent to make this declaration.

1. I live in McAllen, TX. I have resided in the United States for 13 years.
2. I was born in 1987 in Tepalcatepec, Michoacan, Mexico. I attended school in Mexico through the 5<sup>th</sup> grade. After my parents brought me to the United States, I attended school through the 10<sup>th</sup> grade.
3. I am married and have two children. My son A[REDACTED] is in the first grade and my daughter A[REDACTED] is four years old and attends a Head Start program.
4. I am currently studying for my GED. My husband is the sole wage-earner in our family. In addition to caring for my husband and children, I also take care of my mother who lives with us and who has Alzheimer's disease.

5. Outside of participating in GED classes and my responsibilities at home, I attend church every Sunday and attend Bible classes. I volunteer in church activities and I volunteer in my daughter's Head Start program.
6. I believe that I am eligible for deferred action because I am the parent of U.S. citizen children, I have resided continuously in the U.S. since before 2010, I do not have permission to be in the U.S. and I am not an enforcement priority.
7. I want to participate in this case in order to defend deferred action for myself and other parents in my situation.
8. Because I do not have permission to be in the U.S., I would like to proceed in this case pseudonymously. I am aware of the debate in Texas over immigration as reported in the media. I am fearful that if my name and immigration status were made public, I would face opprobrium and possibly harassment from members of the public who support this lawsuit. I understand that deferred action is discretionary on the part of the federal government and am also very concerned that revealing my name and immigration status to federal authorities will subject me to possible arrest, detention and removal from the U.S.
9. If the Court grants my request to proceed as Jane Doe in this lawsuit, my attorneys will file under seal or in camera a second declaration executed by me on this same date in which my true name is revealed.

I declare under penalty of perjury pursuant to 28 U.S. Code § 1746 that the foregoing is true and correct.

Executed this 12<sup>th</sup> day of January, 2015 in McAllen, Texas.

Jane Doe #2  
JANE DOE #2

CERTIFICATE OF TRANSLATION

1. My name is David G. Hinojosa and I speak English and Spanish.
2. I sight translated the foregoing declaration from English to Spanish by reading it to JANE DOE #2 in Spanish.
3. JANE DOE #2 affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury pursuant to 28 U.S. Code § 1746 that the foregoing is true and correct.

Executed this 12<sup>th</sup> day of January, 2015 in McAllen, Texas.

David G. Hinojosa  
David G. Hinojosa

No. 3

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

State of Texas, *et al.*,

Plaintiffs,

v.

United States of America, *et al.*,

Defendants.

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Civil Action No. 1:14-cv-254

DECLARATION OF DEFENDANT INTERVENOR MOVANT JANE DOE #3

My name is JANE DOE #3. I am over the age of 18 and fully competent to make this declaration.

1. I live in Donna, TX. I have resided in the United States for 11 years.
2. I was born in 1983 in Acapetahua, Chiapas, Mexico and completed high school in Mexico.
3. I have a daughter who is two years old. In order to support myself and my daughter, I sell items at the flea market and I make and sell food. I have also worked as a waitress at a taco restaurant and worked taking care of children in my home.
4. I believe that I am eligible for deferred action because I am the parent of a U.S. citizen child, I have resided continuously in the U.S. since before 2010, I do not have permission to be in the U.S. and I am not an enforcement priority.

5. I want to participate in this case in order to defend deferred action for myself and other parents in my situation.
6. Because I do not have permission to be in the U.S., I would like to proceed in this case pseudonymously. I am aware of the debate in Texas over immigration as reported in the media. I am fearful that if my name and immigration status were made public, I would face opprobrium and possibly harassment from members of the public who support this lawsuit. I also understand that deferred action is discretionary on the part of the federal government and am also very concerned that revealing my name and immigration status to federal authorities will subject me to possible arrest, detention and removal from the U.S.
7. If the Court grants my request to proceed as Jane Doe in this lawsuit, my attorneys will file under seal or in camera a second declaration executed by me on this same date in which my true name is revealed.

I declare under penalty of perjury pursuant to 28 U.S. Code § 1746 that the foregoing is true and correct.

Executed this 12<sup>th</sup> day of January, 2015 in Donna, Texas.

Jane Doe #3  
JANE DOE #3

CERTIFICATE OF TRANSLATION

1. My name is David G. Hinojosa and I speak English and Spanish.
2. I sight translated the foregoing declaration from English to Spanish by reading it to JANE DOE #3 in Spanish.
3. JANE DOE #3 affirmed that the contents of the declaration were true and correct to the best of his knowledge.

I declare under penalty of perjury pursuant to 28 U.S. Code § 1746 that the foregoing is true and correct.

Executed this 12 day of January, 2015 in Donna, Texas.

David G. Hinojosa  
David G. Hinojosa